

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:15CR268
)	
Plaintiff,)	JUDGE SARA LIOI
)	
v.)	
)	
AMIR SAID RAHMAN AL-GHAZI, aka)	
"Robert C. McCollum,")	MOTION OF THE UNITED STATES FOR A
)	<u>PRELIMINARY ORDER OF FORFEITURE</u>
Defendant.)	

NOW COMES the United States of America, by and through the undersigned counsel, and moves this Court for the issuance of a Preliminary Order of Forfeiture in the above-captioned case. A proposed Preliminary Order of Forfeiture is attached hereto.

This motion is supported by the following:

1. On July 15, 2015, a 28 count indictment was filed against AMIR SAID RAHMAN AL-GHAZI, aka "Robert C. McCollum," charging him with, among other charges, a violation of 18 U.S.C. § 922(g)(1).
2. The indictment further sought forfeiture pursuant to 18 U.S.C. § 924(d)(1), among other statutes, of the following property: Taurus, .45 caliber handgun, model PT 24/7 PROS DS, serial number NDM25686.
3. On March 16, 2016, AMIR SAID RAHMAN AL-GHAZI, aka "Robert C. McCollum," entered into a plea agreement, pleading guilty to counts one, two, and three of the indictment and agreed to the forfeiture of the Taurus, .45 caliber handgun, model PT 24/7 PROS DS, serial number NDM25686, the firearm listed in Count 3 to which he plead guilty.

4. This Court's jurisdiction in this matter is founded upon 18 U.S.C. § 924(d)(1) which provides: “Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922 . . . shall be subject to seizure and forfeiture . . .”

5. Upon the issuance of a Preliminary Order of Forfeiture, the United States will provide written notice to any known third parties asserting a legal interest in the initially forfeited property described above, and will publish, on an official government internet site (www.forfeiture.gov) for at least 30 consecutive days, notice of the Court's Order and the intent of the United States to dispose of the subject property in such manner as the Attorney General may direct.

WHEREFORE, the United States respectfully requests that this Court enter judgment of criminal forfeiture by issuing the proposed Preliminary Order of Forfeiture, forfeiting to the United States the interest of defendant AMIR SAID RAHMAN AL-GHAZI, aka “Robert C. McCollum,” in the Taurus, .45 caliber handgun, model PT 24/7 PROS DS, serial number NDM25686, and ordering the United States to seize it forthwith and dispose of it in accordance with law.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

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CERTIFICATE OF SERVICE

It is hereby certified that on this 15th day of June, 2018, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Phillip J. Tripi
Phillip J. Tripi
Assistant U.S. Attorney